



CITY OF LODI

COUNCIL COMMUNICATION

AGENDA TITLE: CALFED Bay-Delta Program Programmatic Environmental Impact Statement/Environmental Impact Report

MEETING DATE: June 3, 1998

PREPARED BY: Public Works Director

RECOMMENDED ACTION: That the City Council adopt the attached resolution.

BACKGROUND INFORMATION: This item was presented, discussed, and commented on at the regularly scheduled Council meeting of May 20, 1998, and the special adjourned meeting of May 26, 1998. At Council's direction, staff has put together the attached resolution to formalize Council's comments on the EIS/EIR. Upon adoption, staff will forward the resolution to CALFED along with a request for a presentation in Lodi.

FUNDING: Not applicable.

Richard C. Prima, Jr.
Public Works Director

RCP/lm

Attachment

cc: City Attorney

APPROVED: _____

H. Dixon Flynn -- City Manager

DRAFT

RESOLUTION NO. 98-90

A RESOLUTION OF THE LODI CITY COUNCIL ADOPTING THE CITY OF LODI'S POSITION ON CALFED BAY/DELTA PROGRAM DRAFT PROGRAMMATIC EIS/EIR

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WHEREAS, the City of Lodi is concerned with the water supply and water quality needs of all of San Joaquin County; and

WHEREAS, the CALFED Bay/Delta Program has prepared a Draft Programmatic EIS/EIR; and

WHEREAS, the alternative programs discussed in the Draft EIS/EIR will have significant impacts on San Joaquin County; and

WHEREAS, the City believes the Draft EIS/EIR is inadequate and incomplete for various reasons.

NOW, THEREFORE, BE IT RESOLVED that the City Council hereby directs that the following comments be filed on behalf of the City of Lodi, with respect to the Draft EIS/EIR prior to the deadline for those comments which is July 1, 1998.

1. The Draft EIS/EIR appears to do little if anything to help solve the groundwater overdraft and supply shortage for San Joaquin County. The EIR/EIS on the preferred alternative should address this issue.
2. The Draft EIS/EIR fails to consider the economic impacts of the CALFED proposals. Among other things, the impacts of not meeting the needs of Eastern San Joaquin County for water, and the deprivation of other areas of San Joaquin County of water that has previously been available is not considered. Nor are the statewide economic effects of the alternative proposals adequately considered.
3. Each hydrographic region of California should, to a much greater extent, stand on its own rather than depriving other areas, such as our own, of water that they need.
4. The City is opposed to any isolated facility transporting water from the Sacramento River directly to the State and Federal export pumps. Restoration and protection of the Delta including levee work should have higher priority than increasing water exports.
5. The Draft EIS/EIR continues to assume the use of large quantities of stored Stanislaus River water to dilute the quality of the San Joaquin River and to meet fishery requirements. This is unacceptable to the City of Lodi and results in a violation of the Area of Origin Law.
6. A solution to the overdrafted Eastern San Joaquin County Groundwater Basin is a matter, not only of concern to the City, but to the entire State of

California, in view of the agricultural productivity of the area and the significant population residing within the area. The CALFED Program should consider a specific component to address the needs of Eastern San Joaquin County.

7. While the Draft EIS/EIR mentions the existing Watershed and Delta Protection Acts and Area of Origin Laws, it fails to meaningfully consider the application of these Laws to the alternatives proposed.
8. The Draft EIS/EIR anticipates significant conversion of Delta lands to non-agricultural use. The City of Lodi is opposed to the proposed conversion, other than minimal amounts for levee work. In any event, the economic impacts to the individuals involved and to the San Joaquin County economy must be evaluated. Those impacts would be very significant.
9. Financial assistance should be offered to those agencies required to meet higher discharge standards due to this program.
10. The Water Quality Program appears to encourage higher levels of treatment for wastewater effluent, thereby maintaining flow and improving water quality, while the State's Region 5 Basin Plan encourages land disposal of effluent, thereby decreasing flows. The two plans should be reconciled clearly.

Dated: June 3, 1998

=====

I hereby certify that Resolution No. 98-90 was passed and adopted by the City Council of the City of Lodi in a regular meeting held June 3, 1998, by the following vote:

AYES: COUNCIL MEMBERS-
NOES: COUNCIL MEMBERS -
ABSENT: COUNCIL MEMBERS -
ABSTAIN: COUNCIL MEMBERS -

ALICE M. REIMCHE
City Clerk



SACRAMENTO COUNTY RESOURCE CONSERVATION DISTRICTS
65 Quinta Court, Suite C, Sacramento, California 95823

May 8, 1998

CALFED Bay-Delta Program
1416 Ninth Street, Suite 1155
Sacramento, California 95814
Attn: Rick Breitenbach

RE: Draft Programmatic EIS/EIR

Mr. Breitenbach:

On behalf of the Lower Cosumnes Resource Conservation District, the following comments are offered in regards to the above mentioned program:

1. **Review Period:** The Programmatic EIS/EIR details many complex issues and proposals that have major impact to agriculture and the Delta Environment. CALFED has developed these proposals over several years, yet time available for review is limited. We strongly suggest the review period be extended to allow adequate time for review by landowners who will be most affected by future CALFED decisions.
2. **Economic Impacts:** We do not believe adequate attention has been provided to analyze impacts of proposals upon the economic livelihood of landowners and small towns throughout the Delta area. Page 109 of the Interim Report states "alternatives will not significantly change socioeconomic impacts." We strongly disagree with this conclusion. Just the proposed plans for acquisition and/or easement programs will significantly impact agricultural operations throughout the Delta. Factor in the "multiplier" effect of economic contributions that agriculture makes and CALFED should be able to see that each proposed alternative would indeed have significant economic impact.
3. **Landowner Rights:** The Programmatic EIS/EIR does not provide for study of impacts to landowners "right to farm", nor potential impacts regarding property rights. Please incorporate analysis of the alternative impact to landowners rights and agricultural operations.
4. **Easement Programs:** The RCD is concerned with the expansion of public owned lands and easement programs in the Delta area before CALFED has adopted overall policies and plans for these kinds of efforts. The acquisition of property and easement programs are being implemented "piecemeal" without regard to the final adopted plan by CALFED. On behalf of our Delta constituents, we encourage that agencies such as the California Wildlife Conservation Board, Fish and Game, Natural Resources Conservation Service and others delay acquisition or easement purchase until CALFED

has adopted an overall plan that will guide such programs. Such delay will allow Delta landowners to be informed about future direction of these efforts and make best use of public funds for future land management consistent with CALFED goals.

5. Cosumnes River: The Cosumnes River Watershed has a major impact upon land use management decisions in the Bay-Delta. Resource Conservation Districts and the County of Sacramento have initiated a watershed planning process and Task Force to examine options for flood and land use management that will have a significant impact for decisions throughout the Delta. We invite active participation by CALFED member agencies to ensure that these two planning efforts will complement resource objectives and needs of agriculture.

We look forward to your response and cooperation.

Sincerely, *Bill Shelton*

BILL SHELTON
PRESIDENT, LOWER COSUMNES RCD

cc: Florin RCD
Sloughhouse RCD
Don Notolli, Sacramento County
Pete Wilson, Governor, State of California
Calif. Association of RCDs
Pearlie Reed, USDA NRCS
Henry Wyman, USDA NRCS
Representative Richard Pombo
Representative Vic Fazio
Representative Robert Matsui
Representative John Doolittle
US Senator Dianne Feinstein
US Senator Barbara Boxer
Assembly Member Barbara Alby
Assembly Member Deborah Ortiz
Assembly Member Larry Bowler
Assembly Member Helen Thomson
State Senator Patrick Johnson
State Senator Maurice Johannessen
Delta Protection Commission
Calif. Dept of Fish & Game
Calif. Dept. of Water Resources
Calif. State Water Resource Control Board
US Fish and Wildlife Service
US Army Corps of Engineers
US Environmental Protection Agency



FACSIMILE COVER SHEET

CITY CLERK'S OFFICE
221 WEST PINE STREET - P.O. BOX 3006
LODI, CALIFORNIA 95241-1910
PHONE (209) 333-6702 FAX (209) 333-6807

DATE: May 27, 1998

FROM: Jennifer M. Perrin
Deputy City Clerk

TO: Jack Sieglock

COMMENTS: Mr. Bill Shelton with the Resource Conservation District in Sacramento hand-delivered the attached information to our office regarding the CALFED item. He wanted Council to see this before taking any action so we will include this in the Council packet. In the meantime, here is a copy for you since you will be attending the hearing. (I am also faxing a copy to Bob Johnson). If you want to contact Mr. Shelton, his phone number is (916) 776-1890

THIS TRANSMITTAL CONTAINS 3 PAGE(S), INCLUDING THIS COVER SHEET.



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PRESIDENT, LOWER COSUMNES RCD

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US Senator Dianne Feinstein
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Assembly Member Barbara Alby
Assembly Member Deborah Ortiz
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Assembly Member Helen Thomson
State Senator Patrick Johnson
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should consider a specific component to address the needs of Eastern San Joaquin County.

7. Increased storage is an integral part of meeting water needs for the State, and more specifically, San Joaquin County. Specific water storage projects that can reasonably provide water for San Joaquin County should be included in the program. Examples include Auburn Dam (and the extension of the partially completed Folsom South Canal) on the American River and freeing up water from the Stanislaus River/New Melones Reservoir for San Joaquin County.
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Dated: June 3, 1998

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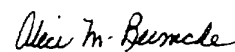
I hereby certify that Resolution No. 98-90 was passed and adopted by the City Council of the City of Lodi in a regular meeting held June 3, 1998, by the following vote:

AYES: COUNCIL MEMBERS - Johnson, Land, Mann, Pennino and
Sieglock (Mayor)

NOES: COUNCIL MEMBERS - None

ABSENT: COUNCIL MEMBERS - None

ABSTAIN: COUNCIL MEMBERS - None


ALICE M. REIMCHE
City Clerk